

ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of

Reclassification of License of  
Station KZFM(FM), Corpus Christi, Texas

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To: Office of the Secretary  
Attn: Assistant Chief, Audio Division  
Media Bureau

Federal Communications Commission  
Office of Secretary

**RESPONSE TO ORDER TO SHOW CAUSE**

Malkan FM Associates ("Malkan"), licensee of Station KZFM(FM), Corpus Christi, Texas, by its counsel, hereby submits its response to the *Order to Show Cause* released October 25, 2004. 19 FCC Rcd 20787. The *Order to Show Cause* informed Malkan that Charles Crawford filed a Petition for Rule Making requesting (i) the allotment of Channel 237A at Karnes City, Texas, and (ii) the modification of the license of Station KZFM(FM) to specify Channel 238C0. In the *Order to Show Cause*, the Commission notes that Station KZFM(FM) is currently authorized at an antenna height above average terrain ("HAAT") that is below the minimum of 451 meters for Class C facilities set forth in the *Second Report and Order* in MM Docket No. 98-93. Pursuant to Note 4 of Section 73.3573 of the Commission's Rules, Malkan is entitled to an opportunity to express its intention to file an application to increase Station KZFM(FM)'s HAAT to at least 451 meters. Therefore, Malkan hereby notifies the Commission that it intends to file a minor change application within 180 days to increase Station KZFM(FM)'s HAAT to at least the minimum for Class C facilities.<sup>1</sup>

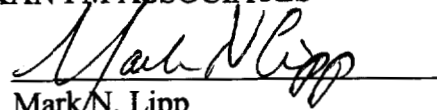
<sup>1</sup> The Order to Show Cause specified a filing deadline of December 9, 2004. Malkan respectfully requests that this statement be accepted one day late.

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Respectfully submitted,

MALKAN FM ASSOCIATES

By:

A handwritten signature in dark ink, appearing to read "Mark N. Lipp", is written over a horizontal line.

Mark N. Lipp

Scott Woodworth

Vinson & Elkins L.L.P.

1455 Pennsylvania Ave, NW

Suite 600

Washington, DC 20004-1008

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Its Counsel

December 10, 2004

**CERTIFICATE OF SERVICE**

I, Lisa M. Holland, a secretary in the law firm of Vinson & Elkins L.L.P., do hereby certify that on this 10th day of December, 2004, I caused copies of the foregoing **"Response to Order to Show Cause"** to be mailed, first class postage prepaid, or hand delivered, addressed to the following persons:

\* Victoria M. McCauley  
Media Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Charles Crawford  
4553 Bordeaux Ave.  
Dallas, TX 75205

  
Lisa M. Holland

\* Hand-delivered